## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

VISUAL TELECOMMUNICATIONS NETWORK, INC.,	)
Plaintiff,	) )
V.	) Civil Action No. 1:08CV 1188
ARMAN DAIE,	)
Defendant/Counter-Plaintiff.	)

## MOTION TO WITHDRAW AS COUNSEL

COMES NOW James F. Davis, Esquire, and the law firm of Greenspun, Shapiro, Davis & Leary, P.C., counsel for Arman Daie, the Defendant/Counter-Plaintiff herein, and moves this Court entry of an Order granting leave of Court to James F. Davis, Esquire, and the law firm of Greenspun, Shapiro, Davis & Leary, P.C., to withdraw as counsel for the Defendant/Counter-Plaintiff, Arman Daie, and in support thereof states as follows:

- 1. Arman Daie cannot fulfill his obligations to the law firm of Greenspun, Shapiro, Davis & Leary, P.C.
- 2. As a result, relations between counsel and client have been strained to the point where counsel can no longer act as an efficient or effective advocate for Mr. Daie in this case.
- 3. Further, the continued representation of Mr. Daie by James F. Davis, Esquire, and the law firm of Greenspun, Shapiro, Davis & Leary, P.C., constitutes a financial hardship upon the firm.

4. Opposing counsel has previously indicated that it does not oppose

the motion to withdraw as counsel.

5. Upon entry of an Order permitting James F. Davis, Esquire, and the

law firm of Greenspun, Shapiro, Davis & Leary, P.C., to withdraw as counsel for

Mr. Daie, all future pleadings and correspondence to Mr. Daie should be mailed

first class, postage prepaid to Arman Daie, 1360 N. Crescent Heights Blvd., Apt

2A, Los Angeles, CA 90046.

Respectfully Submitted, James F. Davis

GREENSPUN, SHAPIRO, DAVIS & LEARY, P.C.

BY: /s/

James F. Davis
Va. State Bar # 41387
Counsel for the Defendant
Crange Paris & Leary F.

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Dated: April 2, 2009

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 2<sup>nd</sup> day of April 2009, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

J. Chapman Petersen, Esquire SUROVELL MARKLE ISAACS & LEVY PLC 4010 University Drive Second Floor Fairfax, VA 22030 jpetersen@smillaw.com

BY: /s/
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